

ATTACHMENT 1

Proposed Changes to Appendix A

to

DPR-19

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**3.6 LIMITING CONDITION FOR OPERATION****I. Snubbers (Shock Suppressors)**

1. During all modes of operation except cold shutdown and refuel, all safety related snubbers listed in Table 3.6.1a and 3.6.1b shall be operable except as noted in Specification 3.6.I.2 through 3.6.I.4.
2. From and after the time a snubber is determined to be inoperable, continued reactor operation is permissible only during the succeeding 72 hours unless the snubber is sooner made operable or replaced. Torus Ring Header snubbers may be inoperable in either of the following configurations until 1983, to facilitate the installation of the Mark I torus attached piping modification.
  - Configuration A: Every other existing snubber pair (up to 3 pairs) on the ECCS header, or
  - Configuration B: One existing snubber from each of the 6 existing snubber pairs on the ECCS header.
3. If the requirements of 3.6.I.1 and 3.6.I.2 cannot be met, an orderly shutdown shall be initiated and the reactor shall be in cold shutdown or refuel condition within 36 hours.
4. If a snubber is determined to be inoperable while the reactor is in the cold shutdown or refuel mode, the snubber shall be made operable or replaced prior to reactor startup. This requirement does not apply to Torus Ring Header snubbers for the period identified in paragraph 3.6.I.2 above.
5. Snubbers may be added to safety related systems without prior license amendment to Tables 3.6.1a and/or 3.6.1b provided that a revision to Tables 3.6.1a and/or 3.6.1b is included with the next license amendment request.

**4.6 SURVEILLANCE REQUIREMENT****I. Snubbers (Shock Suppressors)**

The following surveillance requirements apply to all safety related snubbers listed in Tables 3.6.1a and 3.6.1b.

**1. Visual Inspection**

An independent visual inspection shall be performed on the safety related hydraulic and mechanical snubbers contained in Tables 3.6.1a and 3.6.1b in accordance with the below schedule.

- a. All hydraulic snubbers whose seal material has been demonstrated by operating experience, lab testing or analysis to be compatible with the operating environment shall be visually inspected. This inspection shall include, but not necessarily be limited to, inspection of the hydraulic fluid reservoir, fluid connections, and linkage connection to the piping and anchor to verify snubber operability.
- b. All mechanical snubbers shall be visually inspected. This inspection shall consist of, but not necessarily be limited to, inspection of the snubber and attachments to the piping and anchor for indications of damage or impaired operability.

**No. of Snubbers Found  
Inoperable During  
Inspection Interval**

**Next Required  
Inspection Interval**

0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3, 4	124 days ± 25%
5, 6, 7	62 days ± 25%
≥8	31 days ± 25%

The inspection frequency is based upon maintaining a constant level of snubber protection. Thus, the required inspection interval varies inversely with the observed snubber failures. The number of inoperable snubbers found during a required inspection determines the time interval for the next required inspection. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original require time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

To further increase the assurance of snubber reliability, functional tests will be performed once each refueling cycle. A representative sample of 10% of the safety-related snubbers will be functionally tested. Observed failures on these samples will require testing of additional units.

Hydraulic snubbers and mechanical snubbers may each be treated as different entities for the above surveillance programs.

Hydraulic snubber testing will include stroking of the snubbers to verify piston movement, lock-up, and bleed. Functional testing of the mechanical snubbers will consist of verification that the force that initiates free movement of the snubber in either tension or compression is less than the maximum breakaway friction force. The remaining portion of the functional test consisting of verification that the activation (restraining action) is achieved within the specified range of acceleration in both tension and compression will not be done. This is due to the lack of competitive marketable test fixtures available for station use. Therefore, until such time as test fixtures become available, only part (i) of the test will be performed; part (ii) will not be done.

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When the cause of rejection of the snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

Monitoring of snubber service life shall consist of the existing station record systems, including the central filing system, maintenance files, safety-related work packages, and snubber inspection records. The record retention programs employed at the station shall allow station personnel to maintain snubber integrity. The service life for hydraulic snubbers is 10 years. The hydraulic snubbers existing locations do not impose undue safety implications on the piping and components because they are not exposed to excesses in environmental conditions. The service life for mechanical snubbers is 40 years, lifetime of the plant. The mechanical snubbers are installed in areas of harsh environmental conditions because of their dependability over hydraulic snubbers in these areas. All snubber installations have been thoroughly engineered providing the necessary safety requirements. Evaluations of all snubber locations and environmental conditions justify the above conservative snubber service lives.

A re-analysis of the ring header design based upon acceleration response spectra derived from the original suction header analysis report demonstrates that for normal operation plug seismic, neither the header nor the torus penetrations are over-stressed with all snubbers inoperable. The limitation of a maximum of 3 pairs or 1 snubber from each pair inoperable out of 6 pairs is considered conservative. Since the analysis shows that the plant can operate safely indefinitely with no snubbers on the ring header the limitation on operation and startup with inoperable snubbers until 1983 is justified. This time frame is adequate to allow completion of the Mark I torus attached piping modification.

**TABLE 3.6.1a**

**SAFETY RELATED HYDRAULIC SNUBBERS\***

Note 1. These snubbers are being replaced with mechanical snubbers as delineated in Section 3.6.1.2 and a revised table will be issued upon completion of the Mark I Torus attached piping modification.

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
2	Torus Ring Header 1501-24" (Note 1)	483'	83°			X
3	Torus Ring Header 1501-24" (Note 1)	483'	74°			X
4	Torus Ring Header 1501-24" (Note 1)	483'	38°			X
5	Torus Ring Header 1501-24" (Note 1)	483'	29°			X
7	Torus Ring Header 1501-24" (Note 1)	483'	331°			X
8	Torus Ring Header 1501-24" (Note 1)	483'	322°			X
9	Torus Ring Header 1501-24" (Note 1)	483'	286°			X
10	Torus Ring Header 1501-24" (Note 1)	483'	277°			X
12	Torus Ring Header 1501-24" (Note 1)	483'	218°			X
13	Torus Ring Header 1501-24" (Note 1)	483'	209°			X
15	Torus Ring Header 1501-24" (Note 1)	483'	151°			X
16	Torus Ring Header 1501-24" (Note 1)	483'	142°			X

\*Modifications to this table due to changes in high radiation should be submitted to the NRC as part of the next license amendment request.

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Proposed Changes to Appendix A

to

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**3.6 LIMITING CONDITION FOR OPERATION****1. Snubbers (Shock Suppressors)**

1. During all modes of operation except cold shutdown and refuel, all safety related snubbers listed in Table 3.6.1a and 3.6.1b shall be operable except as noted in Specification 3.6.1.2 through 3.6.1.4.

2. From and after the time a snubber is determined to be inoperable, continued reactor operation is permissible only during the succeeding 72 hours unless the snubber is sooner made operable or replaced. Torus Ring Header snubbers may be inoperable in either of the following configurations until Dec. 31, 1983, to facilitate the installation of the Mark I torus attached piping modification.

Configuration A: Every other existing snubber pair (up to 3 pairs) on the ECCS header, or

Configuration B: One existing snubber from each of the 6 existing snubber pairs on the ECCS header.

3. If the requirements of 3.6.1.1 and 3.6.1.2 cannot be met, an orderly shutdown shall be initiated and the reactor shall be in a cold shutdown or refuel condition within 36 hours.

4. If a snubber is determined to be inoperable while the reactor is in the cold shutdown or refuel mode, the snubber shall be made operable or replaced prior to reactor startup. This requirement does not apply to Torus Ring Header snubbers for the period identified in paragraph 3.6.1.2 above.

5. Snubbers may be added to safety related systems without prior license amendment to Tables 3.6.1a and/or 3.6.1b provided that a revision to Tables 3.6.1a and/or 3.6.1b is included with the next license amendment request.

**4.6 SURVEILLANCE REQUIREMENT****1. Snubbers (Shock Suppressors)**

The following surveillance requirements apply to all safety related snubbers listed in Tables 3.6.1a and 3.6.1b.

**1. Visual Inspection**

An independent visual inspection shall be performed on the safety related hydraulic and mechanical snubbers contained in Tables 3.6.1a and 3.6.1b in accordance with the below schedule

a. All hydraulic snubbers whose seal material has been demonstrated by operating experience, lab testing or analysis to be compatible with the operating environment shall be visually inspected. This inspection shall include, but not necessarily be limited to, inspection of the hydraulic fluid reservoir, fluid connections, and linkage connection to the piping and anchor to verify snubber operability.

b. All mechanical snubbers shall be visually inspected. This inspection shall consist of, but not necessarily be limited to, inspection of the snubber and attachments to the piping and anchor for indications of damage or impaired operability.

**No. of Snubbers Found  
Inoperable During  
Inspection Interval**

**Next Required  
Inspection Interval**

0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3, 4	124 days ± 25%
5, 6, 7	62 days ± 25%
≥ 8	31 days ± 25%

Table 3.6.1.a

SAFETY RELATED HYDRAULIC SNUBBERS\*

Note 1. These snubbers are being replaced with mechanical snubbers as delineated in Section 3.6.I.2 and a revised table will be issued upon completion of the Mark I Torus attached piping modification.

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
2	Torus Ring Header 1501-24" (Note 1)	483'	83°			X
3	Torus Ring Header 1501-24" (Note 1)	483'	74°			X
4	Torus Ring Header 1501-24" (Note 1)	483'	38°			X
5	Torus Ring Header 1501-24" (Note 1)	483'	29°			X
7	Torus Ring Header 1501-24" (Note 1)	483'	331°			X
8	Torus Ring Header 1501-24" (Note 1)	483'	286°			X
9	Torus Ring Header 1501-24" (Note 1)	483'	286°			X
10	Torus Ring Header 1501-24" (Note 1)	483'	227°			X
12	Torus Ring Header 1501-24" (Note 1)	483'	209°			X
13	Torus Ring Header 1501-24" (Note 1)	483'	209°			X
15	Torus Ring Header 1501-24" (Note 1)	483'	151°			X
Isolation Condenser Pipeway Room:						
1	Isolation Condenser Line 1303-12"	558'	180°	X		X
2	Isolation Condenser Line 1303-12"	568'	180°	X		X
3	Isolation Condenser Line 1303-14"	580'	195°	X		X
Drywell:						
23	Drywell Cleanup Line 1201-8"	537'6"	84°	X	X	

\* Modifications to this table, due to changes in high radiation, should be submitted to the NRC as part of next license amendment request.

Table 3.6.1.b

## SAFETY RELATED MECHANICAL SNUBBERS\*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
1	Drywell Recirc. Motor 3B-202	524'	328 <sup>0</sup>	X	X	
2	Drywell Recirc. Motor 3B-202	524'	302 <sup>0</sup>	X	X	
3	Drywell Recirc. Motor 3B-202	524'	315 <sup>0</sup>	X	X	
4	Drywell Recirc. Motor 3A-202	524'	148 <sup>0</sup>	X	X	
5	Drywell Recirc. Motor 3A-202	524'	122 <sup>0</sup>	X	X	
6	Drywell Recirc. Motor 3A-202	524'	135 <sup>0</sup>	X	X	
7	Drywell Recirc. Pump 3B-202	512'	326 <sup>0</sup>	X	X	
8	Drywell Recirc. Pump 3B-202	512'	304 <sup>0</sup>	X	X	
9	Drywell Recirc. Pump 3B-202	507'	315 <sup>0</sup>	X	X	
10	Drywell Recirc. Pump 3A-202	512'	124 <sup>0</sup>	X	X	
11	Drywell Recirc. Pump 3A-202	512'	146 <sup>0</sup>	X	X	
12	Drywell Recirc. Pump 3A-202	507'	135 <sup>0</sup>	X	X	
15	Drywell LPCI Line 1506-16"	513'	256 <sup>0</sup>	X	X	
16	Drywell LPCI Line 1519-16"	513'	95 <sup>0</sup>	X	X	
21	Drywell Recirc. Header 201A-22"	533'6"	22 <sup>0</sup>	X	X	
22	Drywell HPCI Line 2305-10"	550'	121 <sup>0</sup>	X	X	
25	Drywell Cleanup Line 1201-8"	537'6"	78 <sup>0</sup>	X	X	
27	Drywell Cleanup Line 1201-8"	538'6"	60 <sup>0</sup>	X	X	
29	Drywell Core Spray Line 1404-10"	573'	231 <sup>0</sup>	X	X	
30	Drywell Core Spray Line 1403-10"	561'	336 <sup>0</sup>	X	X	
31	Drywell HPCI Line 2305-10"	563'	140 <sup>0</sup>	X	X	

\* Modifications to this table, due to changes in high radiation, should be submitted to the NRC as part of next license amendment request.



Table 3.6.1.b (Continued)

SAFETY RELATED MECHANICAL SNUBBER\*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
32	Drywell Target Rock Valve 203-3A	542'6"	14°	X	X	
33	Drywell Target Rock Valve 203-3A	542'2"	31°	X	X	
34	Drywell Target Rock Valve 203-3A	540'	19°	X	X	
35	Drywell Target Rock Valve 203-3A	540'6"	34°	X	X	
36	Drywell Recirc. Line 3-201B-22"	532'6"	183°	X	X	
37	Drywell Feedwater Line 3-3204D-12"	537'	110°	X	X	
38	Drywell Feedwater Line 3-3204E-12"	538'6"	260°	X	X	
41	Drywell Main Steam Line 3-3001B-20"	534'9"	28°	X	X	
42	Drywell Main Steam Line 3-3001A-20"	534'8"	14°	X	X	
43	Drywell Main Steam Line 3-3001C-20"	534'8"	332°	X	X	
44	Drywell Main Steam Line 3-3001B-20"	542'8"	112°	X	X	
45	Drywell Main Steam Line 3-3001B-20"	543'6"	100°	X	X	
46	Drywell Main Steam Line 3-3001A-20"	543'6"	75°	X	X	
47	Drywell Main Steam Line 3-3001A-20"	544'1"	75°	X	X	
48	Drywell Main Steam Line 3-3001D-20"	542'8"	285°	X	X	
49	Drywell Main Steam Line 3-3001-D-20"	543'6"	285°	X	X	
50	Drywell Main Steam Line 3-3001C-20"	543'6"	255°	X	X	
51	Drywell Main Steam Line 3-3001C-20"	543'6"	255°	X	X	
	Torus					
16	Torus Ring Header 1501-24"	483'	142°			X

ATTACHMENT 3

Final Version of Tables 3.6.1.a

and

3.6.1.b to Appendix A to DPR-19

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**TABLE 6.1a**

**SAFETY RELATED HYDRAULIC SNUBBERS \***

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
	<b>Isolation Condenser Pipeway Room:</b>					
1	Isolation Condenser Line 1303-12"	558'	180°	X		X
2	Isolation Condenser Line 1303-12"	568'	180°	X		X
3	Isolation Condenser Line 1302-14"	580'	195°	X		X

\*Modifications to this table due to changes in high radiation should be submitted to the NRC as part of the next license amendment request.

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TABLE 5.6.1b

SAFETY RELATED MECHANICAL SNUDDERS\*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
1	Drywell Recirc. Motor 2B-202	524'	328°	X	X	
2	Drywell Recirc. Motor 2B-202	524'	302°	X	X	
3	Drywell Recirc. Motor 2B-202	524'	315°	X	X	
4	Drywell Recirc. Motor 2A-202	524'	148°	X	X	
5	Drywell Recirc. Motor 2A-202	524'	122°	X	X	
6	Drywell Recirc. Motor 2A-202	524'	135°	X	X	
7	Drywell Recirc. Pump 2B-202	512'	326°	X	X	
8	Drywell Recirc. Pump 2B-202	512'	304°	X	X	
9	Drywell Recirc. Pump 2B-202	517'	315°	X	X	
10	Drywell Recirc. Pump 2A-202	512'	124°	X	X	
11	Drywell Recirc. Pump 2A-202	512'	146°	X	X	
12	Drywell Recirc. Pump 2A-202	507'	135°	X	X	
13-16	Removed					
17	Drywell Recirc Header 201B-22"	533'6"	195°	X	X	
18-20	Removed					
21	Drywell Recirc Header 201A-22"	533'6"	22°	X	X	
22-23	Removed					
24	Drywell Feedwater Line 3204D-12"	530'	108°	X	X	
25-29	Removed					
30	Drywell Core Spray Line 1403-10"	575'	336°	X	X	
31	Drywell Core Spray Line 1404-10"	562'	231°	X	X	
32	Drywell Target Rock Valve 203-3A	542'6"	16°	X	X	
33	Drywell Target Rock Valve 203-3A	542'4"	31°	X	X	
34	Drywell Target Rock Valve 203-3A	540'0"	19°	X	X	
35	Removed					
36	Drywell Recirc. Line 201B-20"	510'	270°	X	X	

\* Modifications to this table due to changes in high radiation should be submitted to the NRC as part of the next license Amendment report.

**TABLE J.6.1b (Continued)**

**SAFETY RELATED MECHANICAL SNUDDERS\***

<b>SNUDDER NO.</b>	<b>LOCATION</b>	<b>ELEVATION</b>	<b>AZIMUTH</b>	<b>SNUDDER IN HIGH RADIATION AREA DURING SHUTDOWN</b>	<b>SNUDDERS INACCESSIBLE DURING NORMAL OPERATION</b>	<b>SNUDDERS ACCESSIBLE DURING NORMAL OPERATION</b>
37	Drywell Recirc. Line 201A-20"	518'	90°	X	X	
38	Drywell Shutdown Cooling Line 1001A-16"	523'	0°	X	X	
39	Drywell Rx Water Cleanup Line 1201-8"	533'	316°	X	X	
40	Drywell Rx Water Cleanup Line 1201-8"	533'	301°	X	X	
41	Drywell Main Steam Line 3001B-20"	534'	28°	X	X	
42	Drywell Main Steam Line 3001A-20"	536'	14°	X	X	
43	Drywell Main Steam Line 3001D-20"	536'	346°	X	X	
44	Drywell Main Steam Line 3001C-20"	536'	332°	X	X	
45	Drywell Main Steam Line 3001B-20"	545'	105°	X	X	
46	Drywell Main Steam Line 3001B-20"	543'	105°	X	X	
47	Drywell Main Steam Line 3001A-20"	542'	73°	X	X	
48	Drywell Main Steam Line 3001A-20"	543'6"	73°	X	X	
49	Drywell Main Steam Line 3001A-20"	539'	20°	X	X	
50	Drywell Main Steam Line 3001C-20"	543'6"	195°	X	X	
51	Drywell Main Steam Line 3001C-20"	542'	195°	X	X	
52	Drywell Main Steam Line 3001D-20"	543'	343°	X	X	
53	Drywell Main Steam Line 3001D-20"	544'	343°	X	X	

\*Modifications to this table due to changes in high radiation should be submitted to the NRC as part of the next license amendment request.

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**TABLE 3.6.1.b (Continued)**

**SAFETY RELATED MECHANICAL SNUBBER\***

<b>SNUBBER NO.</b>	<b>LOCATION</b>	<b>ELEVATION</b>	<b>AZIMUTH</b>	<b>SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN</b>	<b>SNUBBERS INACCESSIBLE DURING NORMAL OPERATION</b>	<b>SNUBBERS ACCESSIBLE DURING NORMAL OPERATION</b>
2	Torus Ring Header 1501-24"	483'	83°			X
3	Torus Ring Header 1501-24"	483'	74°			X
4	Torus Ring Header 1501-24"	483'	38°			X
5	Torus Ring Header 1501-24"	483'	29°			X
7	Torus Ring Header 1501-24"	483'	331°			X
8	Torus Ring Header 1501-24"	483'	322°			X
9	Torus Ring Header 1501-24"	483'	286°			X
10	Torus Ring Header 1501-24"	483'	277°			X
12	Torus Ring Header 1501-24"	483'	218°			X
13	Torus Ring Header 1501-24"	483'	209°			X
15	Torus Ring Header 1501-24"	483'	151°			X
16	Torus Ring Header 1501-24"	483'	142°			X

\*Modifications to this table due to changes in high radiation should be submitted to the NRC as part of the next license amendment request.

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ATTACHMENT 4

Final Version of Tables 3.6.1.a

and

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Table 3.6.1.a

SAFETY RELATED HYDRAULIC SNUBBERS \*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
	Isolation Condenser Pipeway Room:					
1	Isolation Condenser Line 1303-12"	558'	180°	X		X
2	Isolation Condenser Line 1303-12"	568'	180°	X		X
3	Isolation Condenser Line 1303-14"	580'	195°	X		X
	Drywell:					
23	Drywell Cleanup Line 1201-8"	537'6"	84	X	X	

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\* Modifications to this table, due to changes in high radiation, should be submitted to the NRC as part of next license amendment request.



Table 3.6.1.b

SAFETY RELATED MECHANICAL SNUBBERS\*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION*
1	Drywell Recirc. Motor 3B-202	524'	328 <sup>0</sup>	X	X	
2	Drywell Recirc. Motor 3B-202	524'	302 <sup>0</sup>	X	X	
3	Drywell Recirc. Motor 3B-202	524'	315 <sup>0</sup>	X	X	
4	Drywell Recirc. Motor 3A-202	524'	148 <sup>0</sup>	X	X	
5	Drywell Recirc. Motor 3A-202	524'	122 <sup>0</sup>	X	X	
6	Drywell Recirc. Motor 3A-202	524'	135 <sup>0</sup>	X	X	
7	Drywell Recirc. Pump 3B-202	512'	326 <sup>0</sup>	X	X	
8	Drywell Recirc. Pump 3B-202	512'	304 <sup>0</sup>	X	X	
9	Drywell Recirc. Pump 3B-202	507'	315 <sup>0</sup>	X	X	
10	Drywell Recirc. Pump 3A-202	512'	124 <sup>0</sup>	X	X	
11	Drywell Recirc. Pump 3A-202	512'	146 <sup>0</sup>	X	X	
12	Drywell Recirc. Pump 3A-202	507'	135 <sup>0</sup>	X	X	
15	Drywell LPCI Line 1506-16"	513'	256 <sup>0</sup>	X	X	
16	Drywell LPCI Line 1519-16"	513'	95 <sup>0</sup>	X	X	
21	Drywell Recirc. Header 201A-22"	533'6"	22 <sup>0</sup>	X	X	
22	Drywell HPCI Line 2305-10"	550'	121 <sup>0</sup>	X	X	
25	Drywell Cleanup Line 1201-8"	537'6"	78 <sup>0</sup>	X	X	
27	Drywell Cleanup Line 1201-8"	538'6"	60 <sup>0</sup>	X	X	
29	Drywell Core Spray Line 1404-10"	573'	231 <sup>0</sup>	X	X	
30	Drywell Core Spray Line 1403-10"	561'	336 <sup>0</sup>	X	X	
31	Drywell HPCI Line 2305-10"	563'	140 <sup>0</sup>	X	X	

\* Modifications to this table, due to changes in high radiation, should be submitted to the NRC as part of next license amendment request.

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Table 3.6.1.b (Continued)

SAFETY RELATED MECHANICAL SNUBBER\*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
32	Drywell Target Rock Valve 203-3A	542'6"	14°	X	X	
33	Drywell Target Rock Valve 203-3A	542'2"	31°	X	X	
34	Drywell Target Rock Valve 203-3A	540'	19°	X	X	
35	Drywell Target Rock Valve 203-3A	540'6"	34°	X	X	
36	Drywell Recirc. Line 3-201B-22"	532'6"	183°	X	X	
37	Drywell Feedwater Line 3-3204D-12"	537'	110°	X	X	
38	Drywell Feedwater Line 3-3204E-12'	538'6"	260°	X	X	
41	Drywell Main Steam Line 3-3001B-20"	534'9"	28°	X	X	
42	Drywell Main Steam Line 3-3001A-20"	534'8"	14°	X	X	
43	Drywell Main Steam Line 3-3001C-20"	534'8"	332°	X	X	
44	Drywell Main Steam Line 3-3001B-20"	542'8"	112°	X	X	
45	Drywell Main Steam Line 3-3001B-20"	543'6"	100°	X	X	
46	Drywell Main Steam Line 3-3001A-20"	543'6"	75°	X	X	
47	Drywell Main Steam Line 3-3001A-20"	544'1"	75°	X	X	
48	Drywell Main Steam Line 3-3001D-20"	542'8"	285°	X	X	
49	Drywell Main Steam Line 3-3001-D-20"	543'6"	285°	X	X	
50	Drywell Main Steam Line 3-3001C-20"	543'6"	255°	X	X	
51	Drywell Main Steam Line 3-3001C-20"	543'6"	255°	X	X	

Table 3.6.1.b (Continued)

SAFETY RELATED MECHANICAL SNUBBER\*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
	Torus					
2	Torus Ring Header 1501-24"	483'	83°			X
3	Torus Ring Header 1501-24"	483'	74°			X
4	Torus Ring Header 1501-24"	483'	38°			X
5	Torus Ring Header 1501-24"	483'	29°			X
7	Torus Ring Header 1501-24"	483'	331°			X
8	Torus Ring Header 1501-24"	483'	286°			X
9	Torus Ring Header 1501-24"	483'	286°			X
10	Torus Ring Header 1501-24"	483'	227°			X
12	Torus Ring Header 1501-24"	483'	209°			X
13	Torus Ring Header 1501-24"	483'	209°			X
15	Torus Ring Header 1501-24"	483'	151°			X
16	Torus Ring Header 1501-24"	483'	142°			X

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ATTACHMENT 5

Significant Hazards Consideration Review

Description

The proposed change requests the existing ECCS ring header hydraulic snubbers be replaced with larger mechanical snubbers while the Units are in operation. These snubbers must be changed in order to complete the Mark I containment work. Additionally, for Unit 3 only, the tables listing the safety-related snubbers are updated to include snubber added or changed out recently. A similar request was made and approved in 1980 to allow inoperability of these same ECCS snubbers to install torus support saddles. The analysis performed to support that Technical Specification amendment is also applicable for this case. The analysis demonstrated the effect of removal of all the snubbers on the response of the ECCS ring header for seismic events. Using acceleration response spectra derived from the original ring header analysis, the new analysis demonstrates that, for normal operation plus operating basis earthquake (OBE) loading, stresses remain below code allowable stresses even with all six pairs of snubbers inoperable. Therefore, the requirement that at least three pairs of snubbers or one snubber from each pair be operable at all times is conservative with respect to the more severe analyzed condition of all snubbers inoperable. Removing the snubbers from operability in the manner described does not encroach upon margins provided by the code.

By our review, we believe the proposed change does not involve a significant hazards consideration as it does not increase the probability or consequences of an accident previously evaluated; does not create the possibility of a new or different kind of accident from any previously evaluated; or does not involve a significant reduction in a margin of safety.